In Re Application of: Shell S. Simpson, *et al.*)	Confirmation No: 8476
)	Group Art Unit: 2134
Serial No.: 10/002,062)	
)	Examiner: Powers, William S.
Filed: October 30, 2001)	
)	Atty. Docket No.: 10007669-1
For: SECURE PRINTING TO A WEB-BASED)	
IMAGING PRINT SERVICE	

REPLY BRIEF RESPONSIVE TO EXAMINER'S ANSWER

Mail Stop: Appeal Brief-Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, Virginia 22313-1450

Sir:

The Examiner's Answer mailed November 9, 2007 has been carefully considered. In response thereto, please consider the following remarks.

AUTHORIZATION TO DEBIT ACCOUNT

It is not believed that extensions of time or fees for net addition of claims are required, beyond those which may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fees required therefor (including fees for net addition of claims) are hereby authorized to be charged to deposit account no. 08-2025.

REMARKS

The Examiner has provided in the Examiner's Answer various responses to arguments contained in Applicant's Appeal Brief. Although the Examiner's Answer has added some additional remarks in response to Applicant's arguments, the substance of the rejections and the Examiner's positions have not changed. Accordingly, Applicant stands behind the arguments set forth in the Appeal Brief. In addition, Applicant addresses selected responses in the following.

Regarding claim 1 and Applicant's earlier arguments, the Examiner's Answer states that "the Lagarde patent has a web browser . . . that accesses a web service and downloads web content." Page 12. Therefore, the Examiner asserts that the cited art discloses "downloading into said browser web content associated with said accessed destination web service," as recited in claim 1. Applicant respectfully disagrees since "said browser web content" involves "image data [that] is encrypted using a download public encryption key from the accessed destination web service and transmitted back to the destination web service," as recited in claim 1, which is not disclosed by the cited art.

On this point, the Examiner states that "the Smith patent downloads the public encryption key from the server associated with the recipient and encrypts a document with the public key of the server for secure transmission. . . . The limitations of claim 1 state that the public encryption key is downloaded from 'said accessed destination web service.' There is no limitation of 'recipient' in the claim language. The recipient of the Smith can be a printer or other production device . . . of the server associated with the

recipient device. The Examiner considers the 'receiving server' of Smith to be equivalent to the destination web service of the instant application." Page 12.

In response, Applicant notes that for the receiving server of *Smith* to be synonymous with the destination web service described in claim 1, the receiving server should allow for downloading of web content associated with the receiving server which is not taught or suggested by the *Smith* reference.

The Examiner also states that in "response to Applicant's remark that 'Smith teaches that the encrypted document would have to be decrypted and then reencrypted by the DDCS server utilizing the public encryption key of the recipient', the Examiner respectfully disagrees. The Smith patent states, 'the server decrypts the document using its corresponding private key, converts the document to a new data representation and then either forwards the document to the recipient inside the firewall, or . . . reencrypts the document' . . . . Clearly, the Smith patent has an option to not re-encrypt the document." Page 13. In response, Applicant agrees that the *Smith* reference allows for (1) an unencrypted document to be transmitted or (2) a re-encrypted document to be transmitted, as stated above. Either of which fails to satisfy the claim limitations.

Lagarde fails to cure the deficiencies of the *Smith* reference. Therefore, the proposed combination of *Smith* in view of *Lagarde* fails to disclose the features of claim 1. Using similar reasoning, the cited art does not teach or suggest the subject matter of remaining claims 2-21. For the reasons presented herein and the reasons earlier presented in the Appeal Brief, the cited references are deficient in disclosing claimed

features, and the arguments set forth in the Appeal Brief still stand. The rejection of the pending claims should be withdrawn.

Conclusion

In summary, it is Applicant's position that Applicant's claims are patentable over the applied cited art references and that the rejection of these claims should be withdrawn. Appellant therefore respectfully requests that the Board of Appeals overturn the Examiner's rejection and allow Applicant's pending claims.

Respectfully submitted,

By: _____

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